

JAP:DKK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15M241

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

KHALILA GUNTER,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DMITRIY IOFFE, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about March 13, 2015, within the Eastern District of New York and elsewhere, the defendant KHALILA GUNTER did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960.)

The source of your deponent's information and belief are as follows:¹

1. On or about March 13, 2015, the defendant KHALILA GUNTER arrived at John F. Kennedy International Airport in Queens, New York ("JFK"), aboard JetBlue flight number 60 from Jamaica.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

(A)


2. On or about March 13, 2015, the defendant KHALILA GUNTER was selected for a routine examination by United States Customs and Border Protection ("CBP"). During the examination, CBP agents noticed that the defendant had tied a sweater around her waist in a manner that concealed her groin area and lower body. The CBP agents conducted a pat down and felt a hard object near the defendant's groin area. The CBP agents then conducted a partial body search, discovering a large, egg-shaped object concealed under the defendant KHALILA GUNTER's pants.

3. Agents removed and probed the large, egg-shaped object, revealing a powdery substance. A field-test of the substance was positive for cocaine. The total approximate gross weight of the cocaine was 585.6 grams. The defendant KHALILA GUNTER was then placed under arrest.

4. After being placed under arrest, the defendant KHALILA GUNTER was advised of her Miranda rights by HSI agents. The defendant stated that she understood her rights, and she waived her rights and agreed to speak with law enforcement agents without an attorney present. The defendant then stated, in sum and substance and in part, that she knew she was carrying drugs from Jamaica and knew it was illegal to do so.

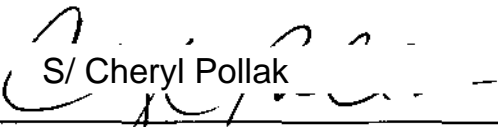
WHEREFORE, your deponent respectfully requests that the defendant
KHALILA GUNTER be dealt with according to law.

Dated: Brooklyn, New York
March 13, 2015



DMITRIY IOFFE
Special Agent
Homeland Security Investigations

Sworn to before me this
13th day of March, 2015



S/ Cheryl Pollak
THE HONORABLE CHERLY L. POLLAK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK